

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

JAMES ST. LOUIS,

PLAINTIFF,

v.

LT. CHERYL MORRIS, et al.,

DEFENDANT.

C.A. 06-236-SLR

JURY TRIAL REQUESTED

**PLAINTIFF MOTION TO COMPEL COUSELOR THOMPSON AND THE COUNSELORS OF
THE STATE OF DELAWARE CORRECTIONAL CENTER**

The plaintiff asks this Court to compel the records of the plaintiff to be released to him for the presentation of evidence included within for the following reasons:

1. Information requested has been requested before by the plaintiff but has been ignored by the counselors.(see ex. A)
2. Information included does not cause a loss of security.
3. Information asked for is essential to plaintiff's case as it shows how plaintiff has co-operated with prison officials at all stages of his incarceration and is important evidence to be presented to the jury.
4. Defendant's attorney believes this information is as importance or it would **not** have asked about plaintiff's other charges or incarcerations when presenting discovery; referring to plaintiff's reputation.
5. Within plaintiff's records are his awards and certificates of completion showing plaintiff's co-operation with authority and needs to be brought to the jury attention seeing this case rest on truth of two individuals and the jury needs to see all the evidence.

October 2, 2007

James St. Louis
JAMES ST. LOUIS

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1181 PADDOCK RD
SMYRNA DE. 19977



BD scanned

6/29/2007

Dear Counselor

I have been ordered via District Court by disclosure for Delaware Justice Dept. To produce records that would be used in my civil law suit. THESE records will include my files, ALL correspondence involving myself, PROGRAMS PSI Reports, CERTIFICATES, CLASSIFICATIONS reports AND ANY other paper work with my NAME upon or involved in or on it. I will need 3 copies AND [MUST] present it to the Dept. of Justice AND DISTRICT COURT within 30 days FROM (June) the 27th of this month. I will also need a copy (3) of my last classification AND how those points were determined AT this time I am also putting [ALL] ^{IN FRONT OF DISTRICT COURT Judge Sue Robinson} COUNSELORS ON NOTICE AS WITNESSES, IF need their presents will be made available to each as to day and time via court paper work.

mailed via in house
6/29/07
CL: file

THANK YOU
446518
James H. Law
Delta East
F 17 B